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June 9, 2010  
(PBW Project No. 1584)

VIA FEDERAL EXPRESS

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-RA)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: May 2010 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan, including: (1) preparation of a Final Screening-Level Ecological Risk Assessment (SLERA) Report (dated May 3, 2010) based on EPA comments on a March 10, 2010 revision of that document as provided in your letter dated April 14, 2010; and (2) preparation of a Final Baseline Ecological Risk Assessment (BERA) Problem Formulation (PF) Report and Final BERA Work Plan and Sampling and Analysis Plan (WP/SAP)(both dated May 10, 2010), based on EPA comments on March 10, 2010 drafts of those documents as provided in your letter dated April 14, 2010.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
  - Analytical reports for tank content samples collected from the aboveground storage tank (AST) tank farm in April were received from the laboratory. These

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reports and an updated validated tank content sample database containing these data are provided in electronic form on the enclosed DVD.

3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
  - Respond to EPA comments on documents referenced in Item Number 1 above.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

Although not required by the UAO, the Respondents listed above have been working with EPA to finalize an Administrative Settlement Agreement and Order on Consent for Removal Action (Removal Action AOC) for tank removal activities at the former tank farm area and repair of the former surface impoundments cap. In addition, Respondents have proposed to perform wetland sediment hot spot remediation activities as part of the above removal action. A draft work plan detailing the proposed wetland sediment remediation activities was submitted to you on April 29, 2010. Draft language to allow performance of the proposed wetland sediment hot spot remediation under the Removal Action AOC was also submitted on April 29, 2010, and a meeting to discuss the proposed wetland sediment hot spot remediation activities was held at your offices on May 17, 2010. The wetland sediment hot spot remediation proposal is currently under EPA review. While that proposal is under review, the tank removal work may be performed as a separate time-critical removal action. Depending on the scope and timing of the removal actions, other actions relating to the progress of work as required in Item Number 3 above may be performed during the next two months.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Ray Merrell – Sequa Corporation  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Donnie Belote - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP